

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS’ RESPONSE AND OBJECTIONS TO PLAINTIFFS’  
“NOTICE TO TAKE ORAL DEPOSITION OF DEFENDANTS THROUGH  
DESIGNATED WITNESSES” AND  
ACCOMPANYING REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants Ethicon, Inc. (“Ethicon”) and Johnson & Johnson (“J&J”) (collectively, “Defendants”) hereby respond to Plaintiffs’ “Notice to Take Oral Deposition of Defendants Through Designated Witnesses” (the “Notice”). The Notice was filed and served on December 4, 2014 [Document1393]. In response to the Notice, the Defendants refer to and incorporate herein their responses and objections in Defendants’ Amended Objections, Response and Request for Meet-and-Confer Regarding Plaintiffs’ “Notice to Take Oral Deposition of Defendants Through Designated Witnesses” and Accompanying Request for Production of Documents filed on June 24, 2014 [Document 1243]. Defendants further object to the deposition date specified in the Notice, but Defendants will continue to meet and confer with Plaintiffs regarding these issues.

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ Christy D. Jones

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/s/ David B. Thomas

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**CERTIFICATE OF SERVICE**

I, Christy D. Jones, certify that on December 15, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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